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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUL 29 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Replacement of Part 90 by)

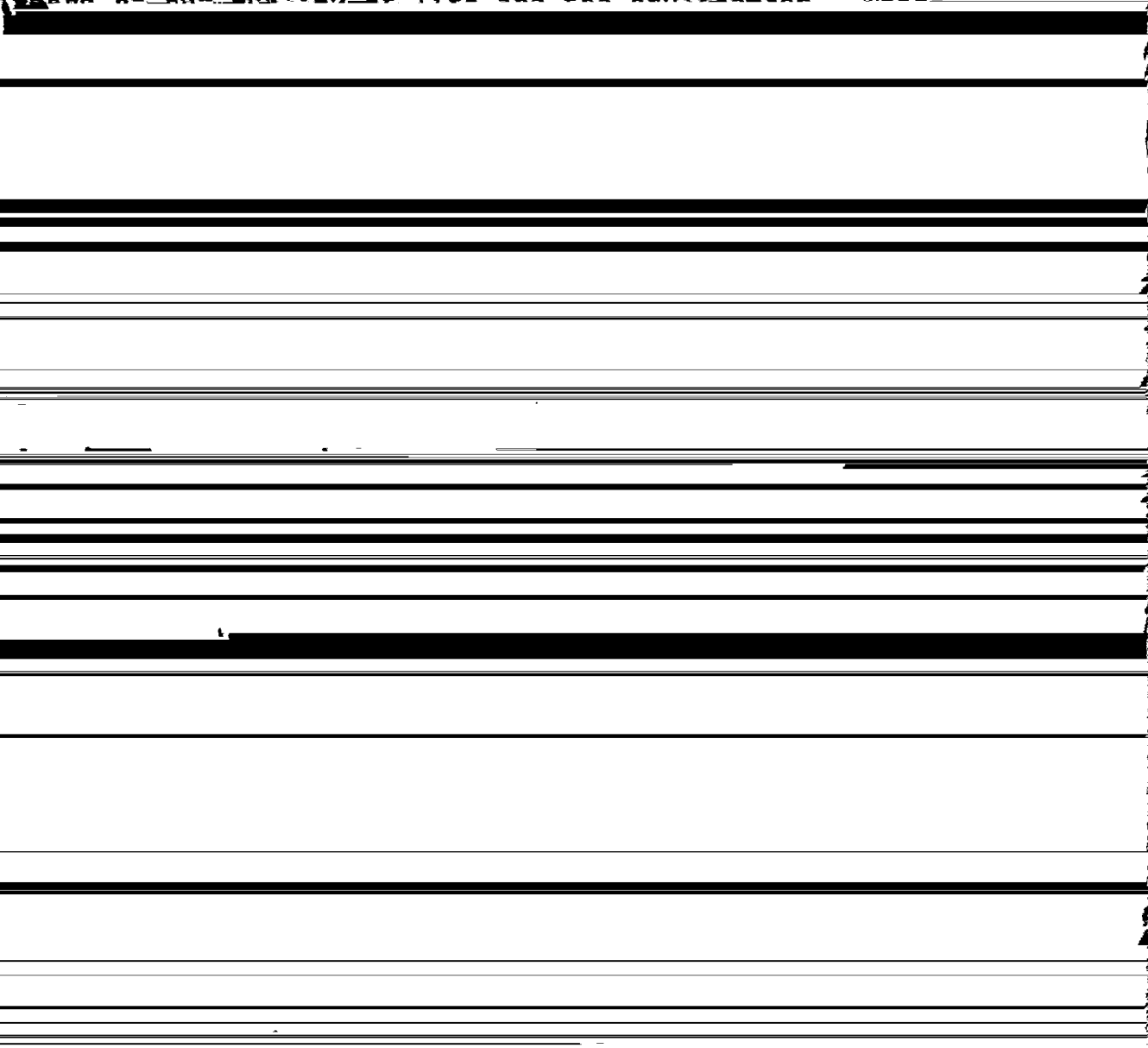
Part 88 to Revise the Private)

PR Docket 92-235 /

After reviewing many of the comments, it is clear that there are a number of issues that need to be addressed in the area of public safety communication.

Interoperability

Interoperability is a major concern to FCCA and to many commentors. FCCA supports the comments of the state of Idaho Department of Lands regarding interoperability. Many Forestry Conservation statewide spectrum users are responsible for fire suppression and other activities that impact on sustainability of life and the environment. These



Federal land but private property in many areas of the country.

Disruption in any way to existing systems will reduce present agency and multi-agency efficiencies, reduce the level of employee safety and increase the probability of greater loss of life and property.

Forest fire suppression efforts, environmental waste cleanup, and conservation law enforcement are very serious businesses. They involve the lives of many dedicated civil servants from local, state and federal agencies. FCCA realizes that agencies working together all need each other to accomplish their vital tasks. Therefore any disruption to existing radio communications is unthinkable and unacceptable.

FCCA supports other commentators advocating a strong positive position regarding interoperability but emphasizes that it is a way of life and necessity for forestry conservation agencies. For example, a major forest fire such as that in Yellowstone National Park in 1988 involved federal and state wildfire suppression personnel from every section of the United States.

Therefore it is essential that all agencies federal, state and local as well as our neighboring nations are enabled to operate in the same frequency plan, framework or structure. We must be able to continue the present level of interoperability. The channel spacing and bandwidth must be compatible and accomplished in a synchronized manner.

Frequency Coordination

Many of the Subpart B radio service frequency coordinators and their representative associations have requested the Commission to retain the present radio services and respective coordinators. FCCA supports that position. FCCA was created and has existed for over 44 years to meet the needs of the governmental agencies and representative associations. That relationship and time have provided FCCA with extensive experience in meeting growing, changing needs and solving radio communications problems for the Forestry Conservation Radio users.

FCCA has learned through the interservice sharing process that no other coordination agency or organization understands its needs or system operations. If some other coordination organization were to preform FCCA's function for forestry conservation agencies, problems would result because of unfamiliarity with conservation users' needs and operating systems. Further, they would not have the direct

responsibility and ties to the forestry conservation user agencies.

APCO suggested in its comments an alternative to the present coordination structure by consolidating to a single public safety frequency coordinator. FCCA disagrees with this suggestion. Forestry conservation radio communications are unique, as is the environment of the other public safety radio services. Each coordination organization has had many years experience dealing with its special requirements. FCCA feels the present coordination organizations can most effectively manage the public safety radio service's spectrum.

at any time. In any event FCCA is fully convinced that PSCC would invite APCO to participate in such an essential planning function.

FCCA feels the PSCC should create a national spectrum use plan ~~for refarmed and presently assigned frequencies~~ including state and local needs for the use of that new spectrum. This will insure that spectrum is used in the most effective manner for all public safety agencies. This in essence will be a user driven plan.

FCCA wants the plan to include not less than five nation-wide mobile-only emergency channels. Trunking channels should established for all of Subpart B spectrum VHF highband and above. This plan should include language to implement coordination functions such as the ability to determine ERP, vertical stacking of the channels, to apply exclusive use criteria, consider the feasibility of fully managing the spectrum to the point of issuing user authorizations and establish exclusivity procedures for identified statewide radio channels. The challenge is great but FCCA feels that the Subpart B coordination organizations can complete the task in two years if the PSCC is charged with the responsibility by the FCC.

FCCA feels that the plans should be implemented in a reasonable period of time, commencing in ten years once equipment becomes available, in order to allow for local planning and funding to take place before interservice sharing is considered.

FCCA recommends the use of vertical stacking to maximize the use of spectrum and permit the coordinators to apply such vertical stacking in their routine process.

Radio System Coverage

The discussions regarding tower height, ERP, coverage

FCCA supports APCO's position suggesting separate rules for public safety users.

Migration, Channel Separation and Bandwidth

FCCA supports LMCC's position to look at the second step of the process in 1999 when we know more about narrower bandwidth equipment.

The bandwidth of the radio must be sufficient to permit whatever intelligence is being transmitted to be transmitted successfully. There are various types of intelligence being transmitted today: voice, data signaling, data terminals and fax machines, and video to mention a few. They may require different bandwidth to transmit their information. It would seem logical to have various bandwidths established for different uses or at least the capability for different bandwidths in each radio service for the different types of uses. Therefore contiguous spectrum is needed.

There are various migration plans presented. FCCA feels if equipment is available in the marketplace then the migration plan can be aggressive. However if equipment doesn't exist at the newer reduced bandwidth then the migration plan should not be established. The migration plan should take into consideration in place equipment and investments as well as the capability of agencies to replace

their radio systems. Many conservation agencies operate their radio equipment for up to 15 years before replacing it.

FCCA feels the FCC will establish a reasonable migration plan that will not result any hardship on governmental agencies.

Frequency Plan

FCCA desires the retention of existing block

allocations and any possible requested radio channels be retained

Other Services

FCCA requests that the FCC commence a refarming process in all other radio services. Further to require all of television broadcast to be moved in the UHF spectrum within 5 years. The vacated VHF spectrum should be utilized by mobile radio users with not less than 20 MHz of spectrum allocated to Subpart B radio users. FCCA recommends that the FCC request the PSCC create a plan for the use of that spectrum in the same manner proposed herein for the refarming process. FCCA further requests that refarming changes be incorporated in the use of this spectrum.

Respectfully submitted,

FORESTRY-CONSERVATION
COMMUNICATIONS ASSOCIATION


Joseph F. Friend, President

July 29, 1993